

THE HON. RICHARD JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAMONT JEFFREY REYNOLDS,

Defendant.

CASE NO. CR18-131 RAJ

DECLARATION OF LAMONT  
REYNOLDS

I, Lamont J. Reynolds, certify and declare as follows:

1. I am the defendant in this case. I am incarcerated at the Lompoc Federal Correctional Institution.

2. For the past six weeks at least I have had problems sleeping at night. In addition to the noise in the dormitory I'm in, I worry a lot about myself and my family and have a hard time falling asleep. I regularly don't fall asleep until past 3 a.m. I feel helpless and hopeless about my situation, being in the worst prison in the BOP. I cannot seem to relax my mind. The lock down conditions are horrible and there is nothing I can do. You can't escape it as we can't go to the gym or yard and there is nothing I can do to relieve my mind from worry.

3. It is not just my diagnosis for COVID, but I have seen people fall down sick in front of me and I have had to help them to get to medical. I saw one person die on a gurney from what I believe to be COVID in May, and I saw medical trying to revive him but he was dead, and I saw them put a cover over his face. I was very scared that could happen to me or anyone of us in here. Even if I was released tomorrow, I think it will take time to get over everything that has happened to me.

4. A few weeks ago, a psychologist came to the dorm and about asked people about their mental health. I told her about my mental distress and she said she would try to set up future consultations with us, but that hasn't happened.


5. On June 9, 2020,<sup>[1]</sup> I saw Dr. Dhaliwal and he talked to me about my liver and kidney disease, but all he did was take my blood pressure. I later put in a kite for someone to do more blood work on me but that was a week ago and nothing has happened since. I have a hard time communicating with Dr. Dhaliwal because he does not speak English fluently.

6. Last Wednesday, when I was trying to get my medical records at "sick call," I heard a nurse tell another inmate within listening distance that we should not put that we are having symptoms of COVID on our sick call forms, even though people are still testing positive.

I certify or declare under penalty of perjury that the foregoing is true and correct.

Dated this 29th day of June 2020, at Lompoc, California.

I am unable to sign this document as it was prepared in Seattle, but I have had it read to me and I am authorizing Neil Fox to sign it on my behalf.

  
Lamont J. Reynolds, by Neil Fox

<sup>1</sup> Note that when I read this back to Mr. Reynolds, I said June 9<sup>th</sup>, but my notes of the conversation show that it was actually on June 12th.